

From: [Anthony Paronich](#)
To: ["Brittany Andres"](#); ["Max Morgan"](#)
Cc: ["Eric Troutman"](#)
Bcc: ["Anthony Paronich"](#)
Subject: RE: Hubble v. Loandepot.com, LLC
Date: Tuesday, October 29, 2024 6:23:00 PM
Attachments: [image001.png](#)

Hello, all. Following up here.

Anthony Paronich
Paronich Law, P.C.
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From: Anthony Paronich <anthony@paronichlaw.com>
Sent: Monday, October 28, 2024 1:27 PM
To: Brittany Andres <brittany@troutmanamin.com>; Max Morgan <max.morgan@theweitzfirm.com>
Cc: Eric Troutman <troutman@troutmanamin.com>
Subject: RE: Hubble v. Loandepot.com, LLC

Hey, Brittany. Not on this one, and so while I get our impasse over the calling records, can you let us know on the rest of the info?

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From: Brittany Andres <brittany@troutmanamin.com>
Sent: Friday, October 25, 2024 5:25 PM
To: Anthony Paronich <anthony@paronichlaw.com>; Max Morgan <max.morgan@theweitzfirm.com>
Cc: Eric Troutman <troutman@troutmanamin.com>
Subject: RE: Hubble v. Loandepot.com, LLC

Hi Anthony

Would you be open to us providing certain stipulations, similar to what we are doing in Abrahamian? I am also happy to discuss this further next week.

Brittany Andres ("The Baroness")

Partner

400 Spectrum Center, Ste. 1550

Irvine, CA 92618

www.tcpaworld.com

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From: Anthony Paronich <anthony@paronichlaw.com>
Sent: Tuesday, October 22, 2024 8:25 AM
To: Brittany Andres <brittany@troutmanamin.com>; Max Morgan <max.morgan@theweitzfirm.com>
Cc: Eric Troutman <troutman@troutmanamin.com>
Subject: RE: Hubble v. Loandepot.com, LLC

Ok, it's been 2 months since we first sought the meet and confer, please let us know this week. Also, in addition to the below, does your client intend to produce any documents?

From: Brittany Andres <brittany@troutmanamin.com>
Sent: Tuesday, October 22, 2024 11:21 AM
To: Anthony Paronich <anthony@paronichlaw.com>; Max Morgan <max.morgan@theweitzfirm.com>
Cc: Eric Troutman <troutman@troutmanamin.com>
Subject: RE: Hubble v. Loandepot.com, LLC

Hi Anthony

Still waiting on some responses from my client. Should be getting back to you shortly.

Brittany Andres ("The Baroness")

Partner

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TROUTMAN AMIN, LLP
— DESERVE TO WIN —

From: Anthony Paronich <anthony@paronichlaw.com>
Sent: Monday, October 21, 2024 6:42 AM
To: Brittany Andres <brittany@troutmanamin.com>; Max Morgan <max.morgan@theweitzfirm.com>
Cc: Eric Troutman <troutman@troutmanamin.com>
Subject: RE: Hubble v. Loandepot.com, LLC

Hello, all. I wanted to follow up here. Please let us know.

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From: Anthony Paronich <anthony@paronichlaw.com>
Sent: Tuesday, October 8, 2024 4:14 PM
To: Brittany Andres <brittany@troutmanamin.com>; Max Morgan <max.morgan@theweitzfirm.com>
Cc: Eric Troutman <troutman@troutmanamin.com>
Subject: RE: Hubble v. [Loandepot.com](https://loandepot.com), LLC

Hello, I wanted to circle back here.

From: Anthony Paronich <anthony@paronichlaw.com>
Sent: Monday, September 23, 2024 3:48 PM
To: Brittany Andres <brittany@troutmanamin.com>; Max Morgan <max.morgan@theweitzfirm.com>
Cc: Eric Troutman <troutman@troutmanamin.com>
Subject: Re: Hubble v. [Loandepot.com](https://loandepot.com), LLC

Thanks for chatting with me today, my notes are below, we'll circle back in a few weeks.

For Interrogatory No. 1, we believe we are entitled to know the identities of any individual who provided factual information for the responses. **You think it's just Rod, but you'll let us know.**

We believe we are entitled to a full response to Interrogatory No. 2 and 3, including where the leads came from, what system was used to make the calls and who was involved in their sending. **We're willing to limit this to just the [Bills.com](https://bills.com) calls for now and any managers that are involved. You'll let us know the platform used.**

With respect to Interrogatory No. 7, we believe production of all leads called with a pre-recorded message from [SuperSamples.com](https://supersamples.com) is appropriate. **We are likely at impasse here, but you'll confirm.**

For Interrogatory No. 9, communications with [SuperSamples.com](https://supersamples.com) or their counsel are relevant. **You'll let us know.**

A production for RPD No. 5 is relevant for willfulness and identified class members, especially because the Plaintiff alleges having made a stop request in this case. **We are likely at impasse here, but you'll confirm.**

Your client has put consent at issue and as such we believe a complete response to RPD No. 11, which are communications about them, is appropriate. **You'll let us know.**

I don't really understand the objection to RPD No. 15 that says you'd like to meet and

confer but won't produce any documents. We believe that, minimally, the following documents should be produced (a) records of pre-records to SuperSamples leads (b) Records of pre-records sent after a DNC request was made. **We are likely at impasse here, but you'll confirm.**

Also, we'd like to confer about your consent defense and the documents you intend to produce on that. As you likely recall, we had a class settlement with Health IQ related to the same website.

Finally, can we please schedule an October deposition of Rod Halperin and Joseph Mascolo. I'm willing to take that via Zoom. **You'll let us know.**

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On Thu, Aug 22, 2024 at 8:18 AM Anthony Paronich <anthony@paronichlaw.com> wrote:

Thanks, Brittany. Could we set up a meet and confer to discuss the below:

- For Interrogatory No. 1, we believe we are entitled to know the identities of any individual who provided factual information for the responses.
- We believe we are entitled to a full response to Interrogatory No. 2 and 3, including where the leads came from, what system was used to make the calls and who was involved in their sending.
- With respect to Interrogatory No. 7, we believe production of all leads called with a pre-recorded message from [SuperSamples.com](https://www.SuperSamples.com) is appropriate.
- For Interrogatory No. 9, communications with [SuperSamples.com](https://www.SuperSamples.com) or their counsel are relevant.
- A production for RPD No. 5 is relevant for willfulness and identified class members, especially because the Plaintiff alleges having made a stop request in this case.
- Your client has put consent at issue and as such we believe a complete response to RPD No. 11, which are communications about them, is appropriate.
- I don't really understand the objection to RPD No. 15 that says you'd like to meet and confer but won't produce any documents. We believe that, minimally, the following

documents should be produced (a) records of pre-records to SuperSamples leads (b) Records of pre-records sent after a DNC request was made.

- Also, we'd like to confer about your consent defense and the documents you intend to produce on that. As you likely recall, we had a class settlement with Health IQ related to the same website.
- Finally, can we please schedule an October deposition of Rod Halperin and Joseph Mascolo. I'm willing to take that via Zoom.

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From: Brittany Andres <brittany@troutmanamin.com>
Sent: Wednesday, August 21, 2024 5:02 PM
To: Anthony Paronich <anthony@paronichlaw.com>; Max Morgan <max.morgan@theweitzfirm.com>
Cc: Eric Troutman <troutman@troutmanamin.com>
Subject: RE: Hubble v. loandepot.com, LLC

Hi Anthony

Please see attached loanDepot's responses to Plaintiff's first set of discovery.

Production to follow shortly.

Brittany Andres ("The Baroness")
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From: Anthony Paronich <anthony@paronichlaw.com>

Sent: Monday, July 22, 2024 2:56 PM

To: Brittany Andres <brittany@troutmanamin.com>; Max Morgan
<max.morgan@theweitzfirm.com>

Cc: Eric Troutman <troutman@troutmanamin.com>

Subject: Hubble v. Loandepot.com, LLC

Hello, all. Our first set of discovery is attached.

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